

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TELESOCIAL INC.,
Plaintiff,

v.

ORANGE S.A., et al.,
Defendants.

Case No. [3:14-cv-03985-JD](#)

PROPOSED VOIR DIRE

The Court will ask these voir dire questions based on the parties' proposed questions and the Court's practice. They are in addition to the standard background questions. The parties should file by **7:00 a.m., July 10, 2017**, a list of (1) the companies to be used in question 3, (2) all witnesses who will be called, and (3) all attorneys to be identified for voir dire purposes. Any objections or concerns will be heard at trial call on July 10, 2017.

IT IS SO ORDERED.

Dated: July 7, 2017



JAMES DONATO
United States District Judge

VOIR DIRE QUESTIONS

1. Do you have any training, education or work experience in science or engineering?
2. Do you have any training, education or work experience in accounting, finance or economics?
3. Have you or anyone close to you worked for any of the following companies [list from parties]?
 - a. Are you personally acquainted with any officer, director or employee of any of those companies?
 - b. Have you or anyone close to you ever owned any stocks or bonds in any of those companies?
 - c. Have you or anyone close to you had any financial dealings with any of those companies?
4. Do you have any strong positive or negative opinions about French companies or business people?
5. Have you or anyone close to you ever used a product or service provided by Orange or France Telecom?
6. Have you or anyone close to you ever used Call Friends, Party Call, Ever Call or Libon?
7. Have you or anyone close to you ever used a product or service provided by Telesocial?
8. Do you have any strong positive or negative opinions about either party in this case, Telesocial or Orange?
9. Do you know any of these attorneys involved in the case [list from parties]?
10. Do you know any of the following individuals who might appear as a witness during trial [list from parties]?
11. Have you or anyone close to you ever appeared in court or a court proceeding as a plaintiff or defendant, witness, victim or expert?
12. Have you or anyone close to you ever invented or designed something?
13. Have you or anyone close to you ever worked in the social media industry?
14. Have you or anyone close to you worked on applications for mobile or desktop devices?

1 15. Do you believe it is wrong for someone to profit from an invention?

2 16. Do you believe that it is wrong for a company to sue another company for trade secret
3 misappropriation?

4 17. Do you believe that it would be wrong to award damages to a trade secret owner if another
5 company is determined to have misappropriated the trade secret?

6 18. Do you have strong positive or negative feelings about trade secrets?

7 19. Have you or anyone close to you ever been involved in any dispute about a trade secret?

8 20. Do you have any strong positive or negative feelings about large multinational
9 corporations?

10 21. Have you or anyone close to you ever worked for a start-up company of any kind?

11 22. Do you have any strong positive or negative feelings about start-up companies?

12 23. Do you have difficulty understanding English or reading documents in English?

13 24. Do you speak, read or write French?

14 25. Have you read about this case, heard it discussed, or otherwise have any personal
15 knowledge of it beyond what you have heard this morning?

16 26. Is there anything I have not discussed with you that you believe might affect your ability to
17 be a fair and impartial juror in this case?